

COMMONWEALTH OF PENNSYLVANIA,  
OFFICE OF ATTORNEY GENERAL  
1600 Arch Street, Suite 300  
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Attorney for Defendant, Trooper N. DeSantis

By: Matthew R. Skolnik (031652011)  
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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
NEWARK VICINAGE**

STEVEN PRUNKEL,

Plaintiff,

v.

COUNTY OF BERGEN, *et al.*,

Defendants.

Hon. Esther Salas, U.S.D.J.  
Hon. Michael A. Hammer, U.S.M.J.

Civil Action No. 17-5154-ES-MAH

**NOTICE OF MOTION OF  
DEFENDANT N. DESANTIS  
FOR TRANSFER OF VENUE  
PURSUANT TO 28 U.S.C. § 1404**

**FILED ELECTRONICALLY**

TO: United States District Court  
District of New Jersey – Newark Vicinage  
M.L. King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

David T. Shivas, Esquire  
BELL & SHIVAS, P.C.  
150 Mineral Springs Drive  
Rockaway, NJ 07866  
*Counsel for Plaintiff*

**PLEASE TAKE NOTICE** that on **August 16, 2021**, or as soon thereafter as counsel may be heard, the undersigned attorney for defendant Trooper N. DeSantis, shall move before the Honorable Esther Salas, U.S.D.J. for an Order transferring venue in this action, pursuant to 28 U.S.C. § 1404, from this District to the United States District Court for the Middle District of Pennsylvania.

**PLEASE TAKE FURTHER NOTICE** that the undersigned shall rely upon the attached Brief in support of the motion.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Fed. R. Civ. P. 78, oral argument is not requested.

A proposed form of Order is attached.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA,  
OFFICE OF ATTORNEY GENERAL

Dated: July 22, 2021

By: /s/ Matthew Skolnik  
Matthew Skolnik  
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*Counsel for Defendant Trooper N. DeSantis*

## CERTIFICATE OF SERVICE

I, Matthew Skolnik, hereby certify that the foregoing Notice of Motion for Transfer of Venue, with supporting papers, has been filed via the Court's Electronic Case Filing System on July 22, 2021 and, pursuant to Local Civ. Rule 5.2, is deemed served and available for viewing and downloading by all counsel of record.

COMMONWEALTH OF PENNSYLVANIA,  
OFFICE OF ATTORNEY GENERAL

By: /s/ Matthew R. Skolnik  
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